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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

12
13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 MICHAEL RICHARD LYNCH AND
STEPHEN KEITH CHAMBERLAIN

17 Defendants.
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CASE NO. 3:18-cr-00577-CRB

**NOTICE OF SCHEDULING
CONFLICTS WITH THE
PROPOSED EXPEDITED TRIAL
SCHEDULE**

Assigned to Hon. Charles R. Breyer

1 In response to the Court's June 20, 2023 Order Proposing Expedited Trial
2 Schedule, Mr. Chamberlain submits the following Notice of Conflicts with the
3 Proposed Expedited Trial Schedule.¹

4 1. From August 8, 2023 through in or about early November 2023,
5 counsel for Mr. Chamberlain, Gary S. Lincenberg, is scheduled to be in trial in a
6 six-defendant case, *United States v. Lacey, et al.*, Case No. 2:18-cr-00422-PHX-
7 DJH (D. Ariz.). This case is a retrial and is expected to begin as scheduled.

8 2. From on or about January 1, 2024, through on or about February 28,
9 2024, co-counsel for Mr. Chamberlain, Michael C. Landman, is scheduled to be on
10 parental leave.

11 3. From March 19, 2024 lasting four to six weeks, Mr. Lincenberg is
12 scheduled to be in trial in a seven-defendant case, *United States v. Quiboloy, et al.*,
13 Case No. 2:20-cr-79-TJH (C.D. Cal.). Certain defendants are outside of the country
14 and have not yet appeared for arraignment. It remains uncertain whether trial will
15 proceed without the foreign defendants.

16 In light of these conflicts, counsel for Mr. Chamberlain respectfully submits
17 that the parties' proposed dates set forth in their joint statement is the earliest date
18 convenient with the parties' schedules and which allow the parties to adequately
19 prepare for pre-trial matters and trial.

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27 ¹ This Notice of Conflicts does not include civil trials in which counsel for Mr.
28 Chamberlain are scheduled to participate.

1 DATED: June 21, 2023

BIRD, MARELLA, BOXER, WOLPERT,
2 NESSIM, DROOKS, LINCENBERG &
3 RHOW, P.C.

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5 By: /s/ Gary S. Lincenberg
6 GARY S. LINCENBERG
7 RAY S. SEILIE
8 MICHAEL C. LADMAN
9 Attorneys for Defendant Stephen Keith
10 Chamberlain
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